

Exhibit A

From: [Kathleen Hartnett](#)
To: [Margaux Poueymirou](#); [Maxwell Pritt](#); [Poppell, Cole A](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSF](#); [Josh Schiller](#); [David Boies](#); [Jesse Panuccio](#); [Ghajar, Bobby A.](#); [Ghazarian, Colette A](#); [Biksa, Liene](#); [Alvarez, Jessica](#); mlemley@lex-lumina.com; [Weinstein, Mark](#); [Stameshkin, Liz](#); [z/Meta-Kadrey](#); [Dunning, Angela L.](#)
Subject: RE: Kadrey et al. v. Meta: Plaintiffs' Reply to Opposition to Modify Court-Ordered Case Schedule
Date: Friday, October 4, 2024 8:47:32 AM
Attachments: [image001.png](#)

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Margaux,

To begin, we object with plaintiffs presenting this information in their reply brief, which deprives Meta of a chance to properly respond before the hearing. We object to your filing this information with the court and reserve all rights.

On your specific question, and reserving our objection to you filing these materials at all, yes, Meta's highly confidential source code and discussion of that source code should be filed under seal.

Although we will respond in due course and as necessary, we also note that the information in Paragraph 9 of Dr. Krein's declaration improperly casts aspersions on Meta's counsel and Cooley's IT personnel, who were facilitating the source code review upon the request of Plaintiffs' counsel, including by creating a new folder for existing information when the existing folder would not open.

Thanks,
Kathleen

Kathleen R. Hartnett

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Pronouns: she, her, hers

From: Margaux Poueymirou <mpoueymirou@saverilawfirm.com>
Sent: Friday, October 4, 2024 6:14 AM
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Subject: Kadrey et al. v. Meta: Plaintiffs' Reply to Opposition to Modify Court-Ordered Case Schedule

[External]

Hi Kathleen,

In light of Judge Chhabria's Order that the parties avoid unnecessary redactions in their filings, please let us know before 9am whether you object to us filing the attached documents in support of our Reply publicly. If you do, we will file under seal.

Thanks,
Margaux Poueymirou
Counsel



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